

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA, <i>ex rel.</i>	:
DILBAGH SINGH, M.D.,	:
PAUL KIRSCH, M.D.,	:
V. RAO NADELLA, M.D., and	:
MARTIN JACOBS, M.D.,	:
:	
Relators,	:
:	
v.	Civil Action No. 04-186E
:	
BRADFORD REGIONAL	:
MEDICAL CENTER,	:
V & S MEDICAL ASSOCIATES, LLC,	:
PETER VACCARO, M.D.,	:
KAMRAN SALEH, M.D.,	:
and DOES I through XX,	:
:	
Defendants.	:
:	

**DEFENDANTS' MOTION TO UNSEAL
REMAINING SEALED DOCUMENTS**

Defendants Bradford Regional Medical Center ("BRMC"), V&S Medical Associates, LLC ("V&S"), Peter Vaccaro, M.D. ("Dr. Vaccaro") and Kamran Saleh, M.D. ("Dr. Saleh"), through their undersigned counsel, hereby move this Honorable Court to unseal the following documents which remain sealed in the above-captioned matter as referenced, where applicable, by document numbers on the docket sheet:

2. 09/09/2004 SEALED MOTION with Proposed Order. (Entered: 09/10/2004)

-- 09/16/2004 ORDER upon motion granting motion to extend the seal period for 60 days. The Application be Granted and the US shall have up to and

including 11/12/04, within which to notify the Court of its decision to intervene in this action. Ordered that the complaint and all other filings in this case remain seal until further ordered of this Court. (Entered: 09/17/2004)

3. 11/04/2004 MOTION by UNITED STATES to Extend Time the Seal Period with Proposed Order. (Entered: 11/05/2004)

-- 11/08/2004 ORDER upon motion granting motion to Extend Time the Seal Period and the United States shall have up to and including 1/11/05, within which to notify the Court of its decision to intervene in this action; and it is further ORDERED that the complaint and all other filings in this case remain under seal until further order of this Court. (Entered: 11/08/2004)

4. 01/11/2005 MOTION by UNITED STATES to Extend Time the seal period with Proposed Order. (Entered: 01/12/2005)

-- 01/18/2005 ORDER upon motion granting motion to Extend Time the seal period until 3-12-05 (Entered: 01/19/2005)

5. 03/09/2005 MOTION by UNITED STATES to Extend Time of sealed period with Proposed Order. (Entered: 03/10/2005)

-- 03/21/2005 ORDER upon motion granting motion to Extend Time of sealed period (Entered: 03/23/2005)

The reasons for this Motion are set forth in the accompanying Brief in Support thereof. Counsel for the Relators have advised they do not consent. In addition, the Assistant United States Attorney previously assigned to this matter has advised that the United States does not consent.

May 14, 2007

Respectfully submitted,

/s/ Daniel M. Mulholland III

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Peter Vaccaro, M.D.
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the attached document was served on each of the following attorneys via the Court's electronic filing system and First Class United States mail on the date set forth below:

Via electronic filing and U.S. mail:

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May 14, 2007

/s/ Daniel M. Mulholland III
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